

1 [Attorney list on signature page]

2 UNITED STATES DISTRICT COURT
3 NORTHERN DISTRICT OF CALIFORNIA

4 SAN JOSE DIVISION ***E-FILED - 10/17/07***

5
6 HYNIX SEMICONDUCTOR INC.; HYNIX
7 SEMICONDUCTOR AMERICA, INC.;
8 HYNIX SEMICONDUCTOR U.K. LTD.; and
9 HYNIX SEMICONDUCTOR
10 DEUTSCHLAND GmbH,

11 Plaintiffs,

12 vs.

13 RAMBUS INC.,

14 Defendant.

CASE NO. C 00-20905 RMW

**~~PROPOSED~~ ORDER EXTENDING
TIME FOR CERTAIN EXPERT
DISCOVERY**

15 RAMBUS INC.,

16 Plaintiff,

17 vs.

18 HYNIX SEMICONDUCTOR INC., HYNIX
19 SEMICONDUCTOR AMERICA INC.,
20 HYNIX SEMICONDUCTOR
21 MANUFACTURING AMERICA INC.,

22 SAMSUNG ELECTRONICS CO., LTD.,
23 SAMSUNG ELECTRONICS AMERICA,
24 INC., SAMSUNG SEMICONDUCTOR,
25 INC., SAMSUNG AUSTIN
26 SEMICONDUCTOR, L.P.,

27 NANYA TECHNOLOGY CORPORATION,
28 NANCY TECHNOLOGY CORPORATION
U.S.A.,

Defendants.

CASE NO. C 05-00334 RMW

1 RAMBUS INC.,

CASE NO. C 05-02298 RMW

2 Plaintiff,

3 vs.

4 SAMSUNG ELECTRONICS CO., LTD.,
5 SAMSUNG ELECTRONICS AMERICA,
6 INC., SAMSUNG SEMICONDUCTOR,
7 INC., SAMSUNG AUSTIN
SEMICONDUCTOR, L.P.,

8 Defendants.

9 RAMBUS INC.,

CASE NO. C 06-00244 RMW

10 Plaintiff,

11 vs.

12 MICRON TECHNOLOGY, INC., and
13 MICRON SEMICONDUCTOR PRODUCTS,
INC.,

14 Defendants.

STIPULATION AND ~~PROPOSED~~ ORDER

WHEREAS, the expert discovery cutoff in the above-captioned actions was set for October 8, 2007 by Order dated July 16, 2007;

WHEREAS, the deadline for Daubert motions in the above-captioned actions was set for October 17, 2007 by Order dated July 16, 2007;

WHEREAS, the parties have agreed to hold the deposition of Jeffrey Lefstin on October 12, 2007;

WHEREAS, the parties have agreed to hold the deposition of Bronwyn Hall on October 15, 2007;

WHEREAS, the parties have agreed to hold the deposition of Jon Stark on October 16, 2007;

WHEREAS, the parties have agreed to hold the deposition of Peter Heuser on October 23, 2007;

WHEREAS, the parties have agreed to hold the deposition of Bruce Jacob on October 26, 2007;

WHEREAS, the parties have agreed to hold the deposition of David Teece on November 9, 2007;

THEREFORE, IT IS ORDERED THAT

The expert discovery cutoff in the above-captioned actions shall be lifted to accommodate the agreement of counsel on these matters. It is further ordered that the October 17, 2007 deadline for Daubert motions and subsequent briefing schedule is extended for purposes of any challenge to David Teece, Bruce Jacob, Jon Stark, Bronwyn Hall, Peter Heuser and Jeffrey Lefstin to the following:

1 David Teece

2 Opening brief is due November 28, 2007. Opposition brief is due December 12,
3 2007. Reply brief is due December 19, 2007. This motion will be heard by the Court on January
4 11, 2008.

5 Bruce Jacob

6 Opening brief is due November 9, 2007. Opposition brief is due November 28,
7 2007. Reply brief is due December 5, 2007. This motion will be heard by the Court on December
8 14, 2007.

9 Jon Stark

10 Opening brief is due October 30, 2007. Opposition brief is due November 13,
11 2007. Reply brief is due November 20, 2007. This motion will be heard by the Court on
12 December 14, 2007.

13 Peter Heuser

14 Opening brief is due November 6, 2007. Opposition brief is due November 20,
15 2007. Reply brief is due November 28, 2007. This motion will be heard by the Court on
16 December 14, ~~2008~~²⁰⁰⁷.

17 Bronwyn Hall

18 Opening brief is due October 29, 2007. Opposition brief is due November 13,
19 2007. Reply brief is due November 20, 2007. This motion will be heard by the Court on
20 December 14, ~~2008~~²⁰⁰⁷.

21 Jeffrey Lefstin

22 Opening brief is due October 26, 2007. Opposition brief is due November 9, 2007.
23 Reply brief is due November 16, 2007. This motion will be heard by the Court on December 14,
24 ~~2008~~²⁰⁰⁷.

25 SO ORDERED,

26
27 DATED: 10/17/07



28 HON. RONALD M. WHYTE

ON BEHALF OF MANUFACTURERS:

DATED: October 12, 2007

Respectfully submitted,

By /s/

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U.S.A.

1 ON BEHALF OF RAMBUS:
2
3
4
5

6 DATED: October 12, 2007

By /s/

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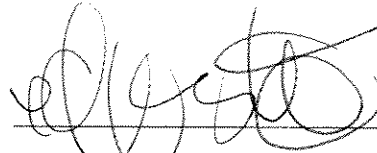
Pierre J. Hubert
Craig N. Tolliver
McKOOL SMITH PC

Attorneys for
RAMBUS INC.

FILER'S ATTESTATION

I, Erin C. Dougherty, am the person under whose ECF number this **[PROPOSED] ORDER
EXTENDING TIME FOR CERTAIN EXPERT DISCOVERY** is being filed, and I attest that I
am authorized to sign and to file by the above-listed counsel for Hynix, Nanya, Micron and
Samsung.

Dated: October 12, 2007

A handwritten signature in black ink, appearing to read 'Erin C. Dougherty', written over a horizontal line.

Erin C. Dougherty